

OMNICOMM GROUP SANCTIONS COMPLIANCE POLICY

1. INTRODUCTION

This Global Sanctions Policy (the “Policy”) outlines the commitment of all companies being members of OMNICOMM GROUP, including any of its subsidiaries and affiliates (collectively, the “Group”) to full compliance with applicable international sanctions laws and regulations in all jurisdictions where it operates. The Group upholds high ethical standards and is committed to ensuring that its operations, employees, contractors, and partners do not engage in activities that contravene economic sanctions or trade restrictions.

This Policy is binding on all employees, directors, officers, consultants, contractors, and agents acting on behalf of the Group worldwide.

2. OBJECTIVES AND GOALS OF THE POLICY

The purpose of this Policy is to:

- ensure compliance with all applicable sanctions regimes, including but not limited to those administered by the United Nations (UN), European Union (EU), United States (OFAC), United Kingdom (OFSI), and other competent authorities where applicable;
- protect the Group from legal, reputational, and financial risks associated with sanctions violations;
- provide a framework for due diligence, monitoring, reporting, and escalation related to sanctions exposure;
- ensure compliance with applicable international and national sanctions laws, including those enforced by the UN, EU, OFAC (U.S. Department of the Treasury), and other relevant authorities;
- safeguard the Group from engaging in prohibited transactions with sanctioned individuals, organizations, or countries.

3. SCOPE OF THE POLICY

3.1. This Policy applies to all operations, business units, legal entities, and personnel of the Group, regardless of location.

3.2. The Policy applies to:

- direct business engagements (e.g., clients, suppliers, partners)
- indirect exposures (e.g., intermediaries, joint ventures)
- transactions, services, funding, or engagements involving or related to sanctioned individuals, entities, governments, vessels, or countries.

3.3. The main sources of regulations for the fulfillment of objectives of the present Policy are:

3.3.1. EU Regulation No. 833/2014 of the Council of 31 July 2014 (the «Sectoral Regulation») containing the following measures: import and export bans such as restrictions on trade in certain goods and technologies, especially those that can be used for military or dual purposes, restrictions on Russian banks’ access to European financial markets and capital and entry bans for certain individuals who are

considered responsible for destabilizing the region;

3.3.2. EU Regulation No. 269/2014 of the Council of 17 March 2014 («Blocking Regulation») containing travel bans and asset freezes along with derogations and authorising EU countries to set up rules on penalties for infringing the bans and restrictions;

3.3.3. EU Regulation No. 267/2012 of the Council of 23 March 2012 containing the measures aimed at ensuring compliance with international requirements related to the non-proliferation of nuclear weapons and the prevention of the development of Iran's nuclear program. It includes: restrictions on financial transactions, control over financial flows between the EU and Iran, including requirements for transparency of transactions and bans on certain banking transactions, trade restrictions such as bans and restrictions on exports to Iran of goods and technologies that can be used to develop nuclear weapons or other types of weapons, freezing of assets and economic resources of individuals and organizations associated with Iran's nuclear program;

3.3.4. International Sanctions Act of Republic of Estonia of 1 January 2020 containing regulation of the application of international sanctions measures on the territory of Estonia and ensuring compliance with Estonia's international obligations in the field of sanctions such as monitoring and reporting of sanctions, as well as establishing liability for legal entities and individuals for non-compliance with sanctions measures provided for by international and national legal acts;

3.3.5. The UK's The Russia (Sanctions) (EU Exit) Regulations 2019 intended to ensure that the UK can operate an effective sanctions regime in relation to Russia containing such measures as financial sanctions, immigration sanctions, trade sanctions, transport sanctions, director disqualification sanctions, etc.;

3.3.6. Executive Orders of the United States No. 13660 (Mar. 6, 2014); 13661 (Mar. 17, 2014); 13662 (Mar. 20, 2014); 13685 (Dec. 19, 2014); 13849 (Sept. 20, 2018); 13883 (Aug. 3, 2019); 14024 (Apr. 15, 2021); 14039 (Aug. 20, 2021); 14065 (Feb. 21, 2022); 14066 (Mar. 8, 2022); 14068 (Mar. 11, 2022); 14071 (Apr. 6, 2022) containing such measures as financial sanctions, immigration sanctions, trade sanctions, transport sanctions, etc.;

3.3.7. Chapter V of Section 31, Chapter VII of Section 15 of the United States Code of Federal Regulations containing measures such as trade bans, financial sanctions and commerce restrictions;

3.3.8. other sources of regulations be it international, regional or national laws, acts or regulation.

4. MAIN DIRECTIONS OF SANCTIONS COMPLIANCE

4.1. Sanctions compliance within OMNICOMM is implemented through the following but not limited in its scope measures and procedures:

- monitoring and controlling business activities and transactions to ensure no sanctions risks are involved.

- screening, monitoring and controlling foreign counterparties for any sanctions restrictions before entering into or continuing business relationships.
- auditing conducted on all the levels of the Group.
- providing consulting services to employees on the applicable sanctions regulations and sanctions risks.
- tracking changes in applicable sanctions regulations to adapt and improvement the Sanctions Compliance procedures.

4.2. Sanctions compliance within OMNICOMM is organized on a case-by-case basis depending on a certain situations. Following procedures and measures may apply:

4.2.1. Sanctions screening / monitoring

4.2.2. Due Diligence and KYC (Know Your Customer) procedures

4.2.3. Contract approval procedures

4.2.4. Recruitment procedures

4.2.5. Training for employees

4.3. In the absence of the information which is requested for the purposes of sanctions compliance/screening, as well as in case that screening of a certain counterparty/candidate is impossible for any reason, approval of cooperation may be rejected by the Group.

4.4. The Group is committed to continuously improving its sanctions compliance program, thus tracking of changes in applicable sanctions may be commenced. Abovementioned measures may be updated to reflect changes in sanctions laws and regulations. and

consequent notification shall be made if such update will take its place. For said reason, consultations for all employees may be commenced upon request.

4.5. Audits may be organized from time to time in order to ensure compliance with this Policy.

4.6. The Group undertakes to maintain a high level of transparency in compliance with sanctions. The Group shall take all reasonable measures to provide transparency of the relevant rules and procedures while implementing/complying with sanctions.

4.7. At the request of the regulatory authorities the Group reports on compliance with the requirements, on inspections carried out, identified risks and measures taken to minimize them can be provided.

5. SANCTIONS COMPLIANCE OBLIGATIONS

The Group (and each of its member companies) shall not knowingly:

- enter into any business relationship or transaction with sanctioned parties or those owned/controlled by them;
- facilitate the evasion or circumvention of sanctions;
- participate in activities involving sanctioned countries or regions, unless expressly permitted by applicable law or under valid license;
- provide goods, services, or technology

that are restricted or prohibited under sanctions laws.

6. ROLES AND RESPONSIBILITIES

6.1. Group Sanctions Compliance Officer (GSCO) is responsible for the Policy implementation, training, monitoring, and advisory support across the Group. Unless or insofar a separate officer is appointed, the role of the Group Sanctions Compliance Officer shall be performed by the Chief Legal Officer of the Group.

6.2. C-Level of the Group (all Directors) provide oversight and ensures that sanctions risks are managed at the highest level.

6.3. Business Units and local managers are accountable for adherence to the Policy, including execution of screening and reporting obligations.

6.4. All Group employees and permanent contractors are required to understand and comply with this Policy and to report any concerns.

6.5. All employees must promptly report:

- suspected breaches of this Policy
- (matches or potential matches to sanctions lists
- transactions or requests that appear suspicious or unusual.

6.6. Reports should be made to legal@omnicomm.ltd. Retaliation against individuals making good-faith reports is strictly prohibited.

6.7. Alleged violations of this Policy will

be promptly investigated by a commission appointed by the GSCO. The amount of commission participants is at least three, with GSCO serving as its chairman, regular timeframe for the commission work is ten business days but may vary depending on the circumstances.

6.8. If breaches are confirmed, the report of such breach shall be provided by the GSCO to the Group CEO and to the HR Director for appropriate action to be taken, which may include:

- disciplinary measures, up to and including termination
 - self-reporting to regulatory authorities
 - review and improvement of internal controls
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7. FINAL PROVISIONS

7.1. The Policy is effective from 30 May 2022

7.2. In all cases, when implementing the procedures of the Policy, the person in charge has the right to request additional information that he considers necessary for making a decision.

7.3. Questions related to implementation of the Policy may be submitted to legal@omnicomm.ltd.